



Agricultural Products Group
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201-15010

December 31, 2003

Michael O. Leavitt, Administrator
US Environmental Protection Agency
P.O. Box 1473
Merrifield, VA 22116
Attention: Chemical Right-to-Know Program

RECEIVED
OPPT/CBIC
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RE: Registration No.:
Common name: Carbofuran
Chemical name: 7-benzofuranol,2,3-dihydro-2,2-dimethyl-methyl carbamate
CAS No.: 1563-66-2

Dear Administrator Levitt:

We at FMC Corporation actively support EPA's HPV Challenge Program and have sponsored the HPV chemicals imported or manufactured by FMC Corporation. We subscribe to the principle of the program that requires basic screening for each of the HPV chemicals.

Carbofuran is a unique chemical that is used both as a pesticide and as an intermediate to produce another pesticide. Its uses as an intermediate are regulated by the Toxic Substances Control Act (TSCA). The majority of carbofuran, however, is used as a pesticide and these uses are regulated by the Federal, Insecticide, Fungicide and Rodenticide Act (FIFRA). Carbofuran has been registered with the U.S. EPA's Office of Pesticide Programs (EPA Reg. No. 279-3060) since 1967 and, for over 35 years, FMC Corporation has generated and submitted a large amount of health and safety data to fully support its registration and re-registration. This substantial database for carbofuran goes well beyond the data requirements of the HPV Challenge Program. In addition, the re-registration process for carbofuran is on-going and we expect the EPA to release its Interim Registration Eligibility Decision for public review and comment in the near future.

Based upon its registration under FIFRA, FMC Corporation believes that the HPVC requirements for carbofuran have been satisfied. Therefore, FMC does not intend to submit data regarding this compound to the HPV Challenge Program.

Please contact me if you have any questions.

Sincerely,

Natalie Rutherford
Global Regulatory Manager
FMC Corporation
Phone: 215-299-6680



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